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September 25, 2023

**VIA ECF**

Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

**Re: *Huerta et al v. J.D. Workforce, Inc. et al.***  
**Civil Action No. 7:23-cv-05382**

Your Honor:

Our office represents the Plaintiffs in the above-captioned matter. We write pursuant to the Court's Individual Rules of Practice, Rule II.A, and in response to the letter-motion filed by defendants J.D. Workforce, Inc., Hamwattie Bissoon, and Steven Deane, seeking a pre-motion conference in anticipation of their motion to dismiss the Complaint (Dkt. No. 24) (the "Letter-Motion").

As required by the Court's Individual Rules of Practice, Rule II.A, Plaintiffs write to advise the Court that they have reviewed the Letter-Motion, and that Plaintiffs will be filing an Amended Complaint. Plaintiffs respectfully request that they be allowed to file an Amended Complaint by October 17, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Katherine Morales  
Katherine Morales

Cc: All Counsel of Record (via ECF)